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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
B; CHRISTANIA, LLC; CHRISTANIA, LLC,
SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
MAHANEY,

Defendants.

**STIPULATION EXTENDING BRIEFING
SCHEDULE ON MOTION FOR LEAVE
TO AMEND ANSWER**

(FIRST REQUEST)



Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants², and Matthew Mahaney, Esq. (“Mahaney”) by and through their respective undersigned counsel, hereby stipulate, subject to this Court’s approval, to continue the briefing deadlines relating to the Steelman Parties’ Motion for Leave to Amend Answer (Doc. 292) for a period of twenty-one (21) days. The deadlines are currently set as follows: Response deadline of Friday, January 3, 2025, and a Reply deadline of Friday, January 10, 2025. The parties are requesting deadlines set as follows: Response Deadline of Friday, January 24, 2025, and a Reply deadline of Friday, January 31, 2025. This is the Parties’ first request to extend these deadlines.

The subject Motion was filed by the Steelman Parties on December 20, 2024, in order to comply with the existing amendment deadline (December 30, 2024) but with the intention of extending the briefing schedule to not overlap with the holidays. Additionally, the subject Motion seeks leave to assert counterclaims in this matter for the first time against Bock and non-party Thomas E. Bock. The Motion raises numerous complex issues interwoven with the lengthy procedural history of multiple litigations. Among other significant issues are whether the Court has personal jurisdiction over Thomas E. Bock; whether amendment would be unduly prejudicial where certain proposed counterclaims have been litigated in New Jersey for nearly ten years; whether amendment is appropriate where the proposed counterclaims arise from agreements with New Jersey forum selection clauses that were previously enforced by the proposed counterclaimants; and whether amendment is appropriate where a New Jersey court previously denied a similar motion to amend in that matter filed by the current proposed counterclaimants.

¹ The “Steeleman Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman, individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman, as trustee of the Paul Steelman Gaming Asset Protection Trust.

² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z; Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman, Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC; SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52) separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). The Corporate Defendants disagree. In the interest of brevity, those defendants have been stylized as “Series A-Z.”

Based on the foregoing, the parties respectfully request that the Court grant the stipulation and approve the deadlines outlined herein.

DATED: January 2, 2025.

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ORDER

IT IS SO ORDERED on this 2nd day of January, 2025.


UNITED STATES MAGISTRATE JUDGE

